

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

PRESIDENT DONALD J. TRUMP,

Plaintiff,

v.

MICHAEL D. COHEN,

Defendant.

Case No.: 23-cv-21377 DPG/TORRES

PLAINTIFF'S MOTION FOR HEARING

Plaintiff, Donald J. Trump, by and through undersigned counsel and pursuant to the Discovery Procedures for Chief Magistrate Judge Edwin G. Torres, identifies the following issues to be heard during the discovery hearing scheduled for **Thursday, July 20, 2023 at 2:30 p.m. in person at James Lawrence King Federal Justice Building, 99 NE 4th Street, Tenth Floor, Courtroom 5, Miami, Florida 33132:**

A. Confidentiality Order

Plaintiff requests that the parties be subject to a Confidentiality Agreement/Protective Order to govern to disclosure and production of confidential information in this action, which involves the former President of the United States and his prior counsel, and which relates to a dispute over the disclosure of alleged confidential and privileged information. Defendant has refused to enter into a Confidentiality Agreement/Protective Order. The parties have conferred via email and telephone regarding this matter but have not been able to reach an agreement.

B. Plaintiff's Deposition

Plaintiff requests that the Court enter the aforementioned Confidentiality Agreement/Protective Order prior to depositions being conducted. The parties have conferred via email and telephone regarding this matter but have not been able to reach an agreement.

CERTIFICATE OF GOOD FAITH CONFERENCE PURSUANT TO LOCAL RULE 7.1

Pursuant to S.D. Fla. L. R. 7.1(a)(3), undersigned counsel for Plaintiff certifies that he has conferred with Defendant's counsel in a good faith effort to resolve their disputes concerning the issues raised herein, but have been unable to resolve such disputes.

Dated: June 27, 2023

Respectfully submitted,

BRITO, PLLC
Counsel for Plaintiff
2121 Ponce de Leon Boulevard
Suite 650
Coral Gables, FL 33134
Office: 305-614-4071
Fax: 305-440-4385

By: /s/ Alejandro Brito
ALEJANDRO BRITO
Florida Bar No. 098442
Primary email: abrito@britopllc.com
Secondary email: apiriou@britopllc.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 27, 2023 the foregoing was served via the Court's

CM/ECF System upon:

Benjamin H. Brodsky, Esq.
Max Eichenblatt, Esq.
Brodsky, Fotiu-Wojtowicz, PLLC
200 SE 1st Street, Suite 400
Miami, Florida 33131
bbrodsky@bfwlegal.com
max@bfwlegal.com
docketing@bfwlegal.com

Counsel for Defendant

E. Danya Perry, Esq. (*Pro Hac Vice*)
E. Danya Perry, PLLC
157 East 86th Street
4th Floor
New York, NY 10028
Dperry@danyaperryllaw.com

Counsel for Defendant

Lilian M. Timmermann, Esq.
Perry Law4
700 S. Rosemary St.,
Suite 204
West Palm Beach, FL 33401
ltimmermann@danyaperryllaw.com

Counsel for Defendant

By: /s/ Alejandro Brito